

SEALED

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FILED

Jun 10, 2021

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

6 Attorneys for Plaintiff
7 United States of America

8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,
12 Plaintiff,

CASE NO. 2:21-cr-00111-WBS

13 v.

PETITION TO SEAL INDICTMENT

14 ROBERT ALLEN POOLEY,
15 Defendants.
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19 TO THE HONORABLE DEBORAH BARNES, UNITED STATES MAGISTRATE JUDGE:
20 COMES NOW CHRISTOPHER S. HALES, Assistant United States Attorney for the Eastern District of
21 California, to petition this Court and respectfully represent:

22 1. I have presented to the Grand Jury now in session in the City of Sacramento, California, one
23 proposed indictment charging the above-named defendant with violations of 18 U.S.C. § 1343 – Wire
24 Fraud (4 counts); 18 U.S.C. § 1028A – Aggravated Identity Theft (2 counts); and 18 U.S.C. §
25 981(a)(1)(C) and 28 U.S.C. § 2461(c)– Criminal Forfeiture.

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1 2. The indictment has been returned by the Grand Jury to this Honorable Court.

2 3. The investigating agent believes that the above-named defendants pose a flight risk and could
3 jeopardize the investigation if the charges are made public before the arrests are effected.

4 THEREFORE, your petitioner prays that the aforesaid indictment, this Petition, and the Order to
5 Seal be sealed pursuant to Rule 6(e)(4) of the Federal Rules of Criminal Procedure the defendants have
6 been arrested or until further order of this Court.

7 PHILLIP A. TALBERT
8 Acting United States Attorney

9 By: /S/ CHRISTOPHER S. HALES
10 CHRISTOPHER S. HALES
11 Assistant United States Attorney